



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JMK/AES  
F.#2014R00501

*271 Cadman Plaza East  
Brooklyn, New York 11201*

June 15, 2017

By Hand and ECF

Honorable Kiyo A. Matsumoto  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Martin Shkreli, Criminal Docket No. 15-637 (KAM)

Dear Judge Matsumoto:

Pursuant to the Court's June 13, 2017 order, the parties submit this joint letter to identify the "specific statements or subjects for which they will offer argument" on June 19, 2017. First, with respect to the defendant Martin Shkreli's motion to preclude and/or modify his prior statements that the government might seek to introduce in its case-in-chief (Dkt No. 229), the government attaches as Exhibit 1 a chart detailing the status of each proposed prior statement. Specifically, the parties agree on the disposition of the statements highlighted in green, and continue to disagree about—and seek to address at oral argument—the disposition of the statements highlighted in red.

Second, with respect to the parties' motions in limine, the defendant has advised that he withdraws his opposition to the government's motion to admit direct evidence related to Elea Capital. The parties request oral argument on all remaining outstanding motions in limine. (See Dkt. Nos. 230 (government's motions in limine) and 234 (defendant's additional motions in limine)).

Finally, the parties request oral argument on the defendant's motion to modify his conditions of release. (See Dkt. No. 246).

Respectfully submitted,

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cc: Brafman & Associates (via ECF)